

Firm No. 37681/File No. 16318

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

SHIRELLE M. WILLIAMS,

Plaintiff,

vs.

No. 07 L 013320

CORRY MICHAEL SHOWERS and
AMERICAN LOGISTICS SERVICES,
LLC,

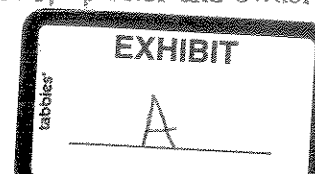
Defendants.

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2008 DEC 19 AM 9:16
CLERK OF THE CLERK OF COOK COUNTY

FIRST AMENDED COMPLAINT AT LAW

NOW COMES the Plaintiff, SHIRELLE M. WILLIAMS, by and through her attorneys, FRIEDMAN AND SOLMOR, LTD, and in complaining of the Defendants, CORRY MICHAEL SHOWERS and AMERICAN LOGISTICS SERVICES, LLC, states as follows:

1. That on the 17th day of June 2007, the Plaintiff, SHIRELLE M. WILLIAMS, was a passenger in a motor vehicle that was proceeding in an easterly direction along and upon I-90 at or near Roselle Road in the City of Schaumburg, County of Cook, and State of Illinois.
2. That on said date, the Defendant, CORRY MICHAEL SHOWERS, was the operator of a semi-tractor trailer truck which was proceeding in an easterly direction along and upon I-90 at or near Roselle Road in the City of Schaumburg, County of Lake, and State of Illinois.
3. That on said date, AMERICAN LOGISTICS SERVICES, LLC, was the owner of the motor vehicle mentioned in Paragraph (2) above.
4. That at all times pertinent hereto, the Defendant, CORRY MICHAEL SHOWERS, was the duly authorized agent of the Defendant, AMERICAN LOGISTICS SERVICES, LLC.
5. That at all times pertinent hereto, it was the duty of the Defendants, CORRY MICHAEL SHOWERS and AMERICAN LOGISTICS SERVICES, LLC, operator and owner respectively, to exercise ordinary care for the safety of the Plaintiff.



6. That notwithstanding said duty, the Defendants, CORRY MICHAEL SHOWERS and AMERICAN LOGISTICS SERVICES, LLC, were guilty of one or more of the following negligent acts or omissions:

- a. operated their semi-tractor trailer truck at an excessive rate of speed under the circumstances;
- b. failed to keep a proper lookout;
- c. failed to keep their semi-tractor trailer truck under proper control;
- d. failed to warn the Plaintiff of the impending danger by sounding their horn and operating their turn signal when such warning was reasonably necessary to insure safety; and
- e. followed too close.

7. That as a direct and proximate result of one or more of the aforementioned negligent acts or omissions of the Defendants, the Defendants' semi-tractor trailer truck struck the rear of the motor vehicle occupied by the Plaintiff, resulting in the Plaintiff sustaining injury to various portions of her body; requiring her to expend money for medical care and treatment; resulting in her experiencing pain, suffering and mental anguish both now and in the future; resulting in her becoming both temporarily and permanently disabled and disfigured; and resulting in her losing money due to her inability to maintain her employment for a period of time.

WHEREFORE, Plaintiff, SHIRELLE M. WILLIAMS, prays judgment against the Defendants, CORRY MICHAEL SHOWERS and AMERICAN LOGISTICS SERVICES, LLC, in a sum of money in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) plus costs.



MARK T. SOLMOR, Attorney for Plaintiff

FRIEDMAN AND SOLMOR, LTD
200 North LaSalle Street
Suite 2750
Chicago, Illinois 60601
Tel. (312) 236-4590